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MEMO ENDORSED

A handwritten signature in black ink, appearing to read "Valerie", is written over a horizontal line.

HON. VALERIE FIGUEREDO
UNITED STATES MAGISTRATE JUDGE

Dated: 7/1/25

As citation to a protective order alone does not warrant sealing, Harrington is directed to make a showing under Lugosch v. Pyramid Co. of Onondaga, 435 F.3d 11 (2d Cir. 2006) by **August 1, 2025**.

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June 25, 2025

VIA ECF

The Honorable Lorna G. Schofield
United States District Judge
Southern District of New York
500 Pearl Street, New York, NY 10007

Re: Harrington Global Opportunity Fund, Ltd. v. BofA Securities, Inc., No. 21-CV-761

Dear Judge Schofield:

We write on behalf of Plaintiff Harrington Global Opportunity Fund, Limited (“Harrington”) in the above-captioned matter. Pursuant to the Protective Order (ECF No. 111) and Your Honor’s Individual Rules and Procedures for Civil Cases Rule I.D.3, we write to request approval to file under seal Harrington’s letter in response to Defendants jointly filed June 15, 2025 letter [ECF 478] and exhibits 1 and 2 thereto, and publicly file versions with appropriate redactions.

Harrington has attached as exhibits to its letter excerpts of the reply reports of Harrington’s experts Jonathan Brogaard and Robert Shapiro. These reports contain information that has been designated Highly Confidential under the Protective Order. Furthermore, Harrington’s letter refers to the findings of these reports. Pursuant to the Protective Order all “copies, reproductions, extracts, digests, and complete or partial summaries prepared from any DESIGNATED MATERIALS shall also be considered DESIGNATED MATERIAL and treated as such under this Order.” ECF No. 111, ¶ 3. Thus, Harrington seeks to file under seal its letter and exhibits 1 and 2 which contain excerpts of the expert reports that contain information that has been designated Highly Confidential.

Pursuant to Your Honor’s Individual Rules and Procedures for Civil Cases, Harrington is publicly filing its responsive letter with placeholder exhibits and filing under seal unredacted copies of such exhibits.

Finally, the below Appendix lists the parties and their counsel of record who should have access to the sealed documents.

Warshaw Burstein, LLP

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Respectfully submitted,

WARSHAW BURSTEIN LLP

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